

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

MARK FLORA

vs.

TRANSOCEAN DRILLING
(USA), INC., ET AL.

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CIVIL ACTION NO. 4:19-CV-2328

DIRECT QUESTIONS TO BE PROPOUNDED TO THE WITNESS

Custodian of Records for: **Cashman Scrap & Salvage LLC**

Records Pertaining To: **Mark Flora**

Type of Records: **Any and all personnel records, including, but not limited to, employment records, applications, references, training manuals, training completed, awards, reprimands, evaluations, disciplinary records, insurance records, benefits and workers' compensation records, as well as, any and all payroll records, including, but not limited to, all records/documents reflecting wages earned, W-2 forms and/or 1099 forms, and time sheets**

1. Please state your full name and telephone number.

Name: RAYMOND RIDDLE

Phone Number: 281-971-8465

2. Please state by whom you are employed and the business address.

Employer: Cashman Scrap & Salvage

Address: 9182 Highway 182, Amelia, LA 70340

3. What is the title of your position or job?

Answer: SVP

4. Are these memoranda, reports, records, or data compilations, outlined in the subpoena duces tecum, pertaining to the above-named entity, in your custody or subject to your control, supervision or direction?

Answer: MARK FLORA NEVER WORKED FOR CASHMAN SCRAP.

5. Are you able to identify these aforementioned records as the originals or true and correct copies of the originals?

Answer: N/A

Order No. 14129.033



GIS-FLORA 001055

6. Please hand to the Officer taking this deposition copies of the memoranda, reports, records, or data compilations, mentioned in Question No. 4. Have you complied? If not, why?

Answer: N/A

7. Are the copies which you have handed to the Officer taking this deposition true and correct copies of such memoranda, reports, records, or data compilations.

Answer: N/A

8. Were such memoranda, reports, records, or data compilations kept in the regular course of business of this facility?

Answer: N/A

9. Was it in the regular course of business of this facility for a person with knowledge of the acts, events, conditions, opinion, or diagnoses, recorded to make the record or to transmit information thereof to be included in such record?

Answer: N/A

10. Were the entries on these records made at or shortly after the time of the transaction recorded?

Answer: N/A

11. What is the retention period of these types of records?

Answer: N/A

12. Was the method of preparation of these records trustworthy?

Answer: N/A

[Signature]
WITNESS (Custodian of Records) SVP

Before me, the undersigned authority, on this day personally appeared _____, known to me to be the person whose name is subscribed to the foregoing instrument in the capacity therein stated, who being first duly sworn, stated upon his/her oath that the answers to the foregoing questions are true and correct. I further certify that the records attached hereto are exact duplicates of the original records.

SWORN TO AND SUBSCRIBED before me this 17th day of September, 2020.

[Signature]
NOTARY PUBLIC

My Commission Expires: 4/22/2027

